

REMARKS

In the non-final Office Action, dated May 20, 2005, the Examiner rejects claims 25-46 under 35 U.S.C. § 103(a) as unpatentable over SHANKAR et al. (U.S. Patent No. 6,570,869) in view of COWGILL (U.S. Patent No. 5,768,361). Applicants respectfully traverse this rejection.

By way of the present amendment, Applicants amend claims 29, 34, 38, 42, and 46 to improve form. No new matter has been added by way of the present amendment. Claims 25-46 remain pending.

Claims 25-46 stand rejected under 35 U.S.C. § 103(a) as unpatentable over SHANKAR et al. in view of COWGILL. Applicants respectfully traverse this rejection.

The three basic criteria for establishing a *prima facie* case of obviousness are articulated in M.P.E.P. § 2142. First, there must be some suggestion or motivation, either in the reference(s) themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim features. SHANKAR et al. and COWGILL do not teach or suggest features recited in claims 25-46.

For example, claim 25 is directed to a method for establishing a telephone call. The method includes receiving a call establishment request, mapping a nature of address indicator from a first format to a second format, and establishing the telephone call based on the mapping. SHANKAR et al. and COWGILL do not disclose or suggest this combination of features.

For example, SHANKAR et al. and COWGILL do not disclose or suggest mapping a nature of address indicator from a first format to a second format. The Examiner admits that

SHANKAR et al. does not disclose this feature and relies on col. 13, line 10, to col. 14, line 65, of COWGILL for allegedly disclosing the above feature of claim 25 (Office Action, pg. 3).

Applicants respectfully disagree.

At col. 13, line 10, to col. 14, line 65, COWGILL discloses mapping a generic address, which includes a nature of address indicator field, into a called party parameter (col. 14, lines 52-54). COWGILL discloses that the mapping includes copying a field from the generic address to a field of the called party parameter (col. 14, lines 64-66). COWGILL in no way discloses or suggests mapping a nature of address indicator from a first format to a second format, as recited in claim 25. Instead, COWGILL merely discloses the copying of a field from a generic address to a field of a called party parameter.

Since SHANKAR et al. and COWGILL do not disclose or suggest mapping a nature of address indicator from a first format to a second format, SHANKAR et al. and COWGILL cannot disclose or suggest establishing a telephone call based on the mapping, as also recited in claim 25.

SHANKAR et al. and COWGILL do not disclose or suggest the combination of features recited in claim 25. Therefore, a *prima facie* case of obviousness has not been established with respect to claim 25.

For at least the foregoing reasons, Applicants submit that claim 25 is patentable over SHANKAR et al. and COWGILL, whether taken alone or in any reasonable combination.

Claims 26-29 depend from claim 25. Therefore, these claims are patentable over SHANKAR et al. and COWGILL, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 25. Moreover, these claims recite additional

features not disclosed or suggested by SHANKAR et al. and COWGILL.

For example, claim 26 recites mapping a numbering plan indicator from the first format to the second format. The Examiner admits that SHANKAR et al. does not disclose this feature and relies on col. 13, line 10, to col. 14, line 65, of COWGILL for allegedly disclosing the above feature of claim 25 (Office Action, pg. 3). Applicants respectfully disagree.

At col. 13, line 10, to col. 14, line 65, COWGILL discloses mapping a generic address, which includes a numbering plan indicator field, into a called party parameter (col. 14, lines 52-54). COWGILL discloses that the mapping includes copying a field from the generic address to a field of the called party parameter (col. 14, lines 64-66). COWGILL in no way discloses or suggests mapping a numbering plan indicator from a first format to a second format, as recited in claim 25. Instead, COWGILL merely discloses the copying of a field from a generic address to a field of a called party parameter.

Since SHANKAR et al. and COWGILL do not disclose or suggest the above feature of claim 26, a *prima facie* case of obviousness has not been established with respect to claim 26.

For at least these additional reasons, Applicants submit that claim 26 is patentable over SHANKAR et al. and COWGILL, whether taken alone or in any reasonable combination.

Claim 28 recites that the first format includes a session initiation protocol format. The Examiner relies on col. 1, lines 25-37, and col. 4, line 50, to col. 5, line 27, of SHANKAR et al. for allegedly disclosing this feature (Office Action, pg. 4). At the outset, Applicants note that the Examiner admits that SHANKAR et al. does not disclose mapping a nature of address indicator from a first format to a second format. Therefore, it is unclear how the Examiner can reasonably rely on SHANKAR et al. for disclosing that the first format includes a session initiation protocol

format. Applicants note that COWGILL does not disclose or suggest a session initiation protocol format.

Nonetheless, at col. 1, lines 25-37, SHANKAR et al. discloses:

Over the decades, however, major voice carriers have invested heavily in developing a Signaling System 7 (SS7) signaling and switching infrastructure to offer reliable telephone service. This infrastructure includes countless systems for billing, provisioning, maintenance, and databases that are compatible only with SS7. These systems are commonly referred to "legacy systems," a term that also includes other proprietary protocols such as ISDN_PRI, DPNSS, ISUP, TUP, NUP, H.323, and SIP. Due to the substantial investment in the legacy systems, it is desirable to keep the legacy systems in operation, yet still take advantage of the newer packet technologies.

This section of SHANKAR et al. discloses that the term "legacy systems" includes SIP. This section of SHANKAR et al. in no way discloses or suggests mapping a nature of address indicator from a first format to a second format, where the first format includes a session initiation protocol (SIP) format. In fact, this section of SHANKAR et al. in no way relates to mapping.

At col. 4, line 50, to col. 5, line 27, SHANKAR et al. discloses that originating signaling unit 120 and terminating signaling unit 140 convert the legacy protocols, such as SIP, of originating node 100 and terminating node 160 into messages for communicating with one another and for controlling a coding unit over control lines 114 and 154. This section of SHANKAR et al. in no way discloses or suggests that the conversion of legacy protocols includes mapping a nature of address indicator from SIP to a second format, as recited in claim 28.

Since SHANKAR et al. and COWGILL do not disclose or suggest the above feature of claim 28, a *prima facie* case of obviousness has not been established with respect to claim 28.

For at least these additional reasons, Applicants submit that claim 28 is patentable over SHANKAR et al. and COWGILL, whether taken alone or in any reasonable combination.

Claim 29 recites that the second format includes one of signaling system 7 (SS7) format, integrated services digital network (ISDN) format, ISDN user part (ISUP) format, or channel associated signaling (CAS) format. The Examiner relies on col. 1, lines 25-37, and col. 4, line 50, to col. 5, line 27, of SHANKAR et al. for allegedly disclosing this feature (Office Action, pg. 4). At the outset, Applicants note that the Examiner admits that SHANKAR et al. does not disclose mapping a nature of address indicator from a first format to a second format. Therefore, it is unclear how the Examiner can reasonably rely on SHANKAR et al. for disclosing the second format including one of SS7 format, ISDN format, ISUP format, or CAS format.

Nonetheless, col. 1, lines 25-37, of SHANKAR et al. is reproduced above. This section of SHANKAR et al. discloses the term "legacy systems" includes ISDN_PRI, DPNSS, ISUP, TUP, NUP, H.323, and SIP. This section of SHANKAR et al. in no way discloses or suggests mapping a nature of address indicator from a first format to a second format, where the second format includes one of SS7 format, ISDN format, ISUP format, or CAS format. In fact, this section of SHANKAR et al. in no way relates to mapping.

At col. 4, line 50, to col. 5, line 27, SHANKAR et al. discloses that originating signaling unit 120 and terminating signaling unit 140 convert the legacy protocols, such as DPNSS, ISDN_PRI, SS7/C7 (including ISUPs, TUPs, and NUPs), H.323, SIP, or CAS, of originating node 100 and terminating node 160 into messages for communicating with one another and for controlling a coding unit over control lines 114 and 154. This section of SHANKAR et al. in no way discloses or suggests that the conversion of legacy protocols includes mapping a nature of

address indicator from a first format to one of SS7 format, ISDN format, ISUP format, or CAS format, as recited in claim 29.

Since SHANKAR et al. and COWGILL do not disclose or suggest the above feature of claim 29, a *prima facie* case of obviousness has not been established with respect to claim 29.

For at least these additional reasons, Applicants submit that claim 29 is patentable over SHANKAR et al. and COWGILL, whether taken alone or in any reasonable combination.

Independent claim 30 is directed to a method for establishing a telephone call. The method includes receiving a call establishment request, mapping a numbering plan indicator from a first format to a second format, and establishing the telephone call based on the mapping. SHANKAR et al. and COWGILL do not disclose or suggest this combination of features.

For example, SHANKAR et al. and COWGILL do not disclose or suggest mapping a numbering plan indicator from a first format to a second format. The Examiner admits that SHANKAR et al. does not disclose this feature and relies on col. 13, line 10, to col. 14, line 65, of COWGILL for allegedly disclosing the above feature of claim 30 (Office Action, pg. 3). Applicants respectfully disagree.

At col. 13, line 10, to col. 14, line 65, COWGILL discloses mapping a generic address, which includes a numbering plan indicator field, into a called party parameter (col. 14, lines 52-54). COWGILL discloses that the mapping includes copying a field from the generic address to a field of the called party parameter (col. 14, lines 64-66). COWGILL in no way discloses or suggests mapping a numbering plan indicator from a first format to a second format, as recited in claim 30. Instead, COWGILL merely discloses the copying of a field from a generic address to a field of a called party parameter.

Since SHANKAR et al. and COWGILL do not disclose or suggest mapping a numbering plan indicator from a first format to a second format, SHANKAR et al. and COWGILL cannot disclose or suggest establishing a telephone call based on the mapping, as also recited in claim 30.

SHANKAR et al. and COWGILL do not disclose or suggest the combination of features recited in claim 30. Therefore, a *prima facie* case of obviousness has not been established with respect to claim 30.

For at least the foregoing reasons, Applicants submit that claim 30 is patentable over SHANKAR et al. and COWGILL, whether taken alone or in any reasonable combination.

Claims 31-34 depend from claim 30. Therefore, these claims are patentable over SHANKAR et al. and COWGILL, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 30. Moreover, these claims recite additional features not disclosed or suggested by SHANKAR et al. and COWGILL.

For example, claims 31-34 recite features similar to features described above with respect to claims 25-29. Therefore, these claims are patentable over SHANKAR et al. and COWGILL, whether taken alone or in any reasonable combination, for at least reasons similar to reasons given above with respect to claims 25-29.

Independent claims 35, 39, 43, and 44 recite features similar to features described above with respect to claims 25 and 30. Therefore, these claims are patentable over SHANKAR et al. and COWGILL, whether taken alone or in any reasonable combination, for at least reasons similar to reasons given above with respect to claims 25 and 30.

Claims 36-38 depend from claim 35. Therefore, these claims are patentable over

SHANKAR et al. and COWGILL, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 35. Moreover, these claims recite features similar to features described above with respect to claims 26-29. Therefore, these claims are also patentable over SHANKAR et al. and COWGILL for at least reasons similar to reasons given above with respect to claims 26-29.

Claims 40-42 depend from claim 39. Therefore, these claims are patentable over SHANKAR et al. and COWGILL, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 39. Moreover, these claims recite features similar to features described above with respect to claims 26-29. Therefore, these claims are also patentable over SHANKAR et al. and COWGILL for at least reasons similar to reasons given above with respect to claims 26-29.

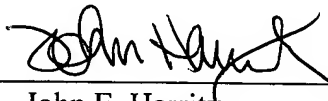
Claims 45 and 46 depend from claim 44. Therefore, these claims are patentable over SHANKAR et al. and COWGILL, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 44. Moreover, these claims recite features similar to features described above with respect to claims 26-29. Therefore, these claims are also patentable over SHANKAR et al. and COWGILL for at least reasons similar to reasons given above with respect to claims 26-29.

In view of the foregoing amendment and remarks, Applicants respectfully request the Examiner's reconsideration of this application, and the timely allowance of the pending claims.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 13-2491 and please credit any excess fees to such deposit account.

Respectfully submitted,

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Date: August 18, 2005

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